

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	Case No.: 16-18536
Carl Lee	:	
	:	
	:	
Debtor	:	Chapter 13

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RESPONSE OF CARL LEE TO THE CERTIFICATE OF DEFAULT

Carl Lee, through the undersigned counsel denies that the he is delinquent in the sum in excess of \$16,219.06. By way of further answer, my clients March 18, 2019 mortgage statement attached hereto and labeled as Exhibit "A" lists a delinquency in the total sum \$11,891.84. Lastly, over the past year my client has endured repeated thefts which rendered him financially unable to stay current with his mortgage obligations.

WHEREFORE, Carl Lee, respectfully request that this Court deny an Order Granting Relief from the Automatic Stay.

/s/Brad J. Sadek, Esquire

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Dated: April 9, 2019